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uniden®

October 30, 1992

FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, NW
Washington, D.C. 20554

Attn: Ms. Donna R. Searcy
Secretary

RE: COMMENTS TO RM-8094

Dear Ms. Searcy:

On behalf of Uniden America Corporation, please accept the enclosed Comments to the Telecommunications Industry Association, Personal Communications Section's petition requesting an Amendment of the Commission's Rules to Establish New Frequencies for Cordless Telephones near 44 and 49 MHz. This petition was placed on Public Notice on October 1, 1992 with the Rule Making assignment of 8094.

There is one original and nine copies pursuant to 47 CFR 1.419 (b). Additionally, there is another copy that we would appreciate being returned in the enclosed envelope after it is stamped in your office indicating its being received.

Thank you for your usual consideration in this matter.

Sincere regards,

James R. Haynes
Chief Engineer

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ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of	)	
	)	
Amendment of the Commission's Rules	)	
to Establish New Frequencies for	)	RM-8094
Cordless Telephones near 44 and 49 MHz	)	

COMMENTS OF
UNIDEN AMERICA CORPORATION

INTRODUCTION

1. Uniden America Corporation (hereinafter "Uniden") respectfully submits its comments to the above captioned petition to request an amendment of the Commission's Rules.

2. Uniden is pleased to note that it has been a member of the Telecommunications Industry Association (TIA) Personal Communications Section ("the Section") and participated in the formation of the above referenced request. Further, we are pleased to offer our support to the TIA objectives in obtaining the Commission's approval for the sharing of the fifteen additional frequency pairs for cordless telephones identified in the Section's petition.

BACKGROUND

3. Since the early days of cordless telephones, Uniden has been one of the major contributors to the advancement of this technology. We were active in the Section's negotiations, ten years ago, to secure the current ten frequency pairs near 46 and 49 MHz. Uniden was the first company to have these cordless telephones certified by the Commission. During the ensuing years, cordless telephones have achieved the status of a staple and utility device in the American home, resulting in increased spectrum usage on these frequencies. Coincidentally, usage of shared frequencies in this area has also increased. The situation today is that half of the current channels available to cordless telephones have become crowded to the extent that co-channel interference has reached an intolerable level in many geographical areas.

DISCUSSION

4. The only prudent solution is to create additional communication paths without causing prohibitive design changes to the device. A significant redesign would undoubtedly cause a marketplace upheaval. Therefore, the sharing of spectrum on a secondary basis of frequencies in close proximity to the existing cordless telephone channels meets the criteria for this solution.

5. Although the Section's request incorporates certain restrictions in order to use the additional frequency pairs, Uniden believes that a minor redesign of the cordless telephone can be achieved without a drastic monetary burden to potential purchasers of new cordless telephones.

6. Typically, the primary users of allocated spectrum are reluctant to share because of the assumed potential for increased interference caused by the secondary users. It should be pointed out that cordless telephones will not be a contributor of interference to the primary users because of the extremely low power emitted from cordless telephones. It is an often overlooked fact that the emission output level from the cordless telephone transmitter is less than that allowed as spurious emissions in many other services. The emission level mandated by the Commission for cordless telephones equates to about 25 microwatts of radiated power. By comparison to the 300 watt allowance for the primary users, it could be stated that the "flea-power" radio frequency energy transmitted by the cordless telephone will only be detected by the primary users if their receivers are within a few hundred feet of the cordless telephone device. An additional consideration is that most of the radios used in the primary services are mobile units which will only be temporary in any given area. The above examples, along with the mandatory monitoring and dynamic channel reassignment protocol required for cordless telephones using these new

frequencies, should give the primary users comfort in knowing that cordless telephones will be an excellent sharing partner.

CONCLUSION

7. For the above reasons, Uniden respectfully asks the Commission to proceed with the Section's request to establish new frequencies for cordless telephones near 44 and 49 MHz by issuing a Notice of Proposed Rule Making as soon as possible.

Respectfully submitted,

UNIDEN AMERICA CORPORATION

James R. Haynes
Chief Engineer